



CITY OF GIG HARBOR

2023 STORMWATER MANAGEMENT PROGRAM (SWMP)

City of Gig Harbor, WA
March 2023

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CITY OF GIG HARBOR 2023 STORMWATER MANAGEMENT PROGRAM

1. INTRODUCTION

1.1 Overview and Background

The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the federal Clean Water Act, which is intended to protect and restore waters for “fishable, swimmable” uses. The federal Environmental Protection Agency (EPA) has delegated permit authority to state environmental agencies. In Washington, the NPDES delegated permit authority is the Washington State Department of Ecology (Ecology).

Municipalities with a population of over 100,000 (as of the 1990 census) have been designated as Phase I communities and must comply with Ecology’s Phase I NPDES Municipal Stormwater Permit. With Gig Harbor’s 1990 census falling below the 100,000 threshold, the City must comply with the Phase II Municipal Stormwater Permit. About 100 other municipalities in Washington must now comply with the Phase II Permit, along with Gig Harbor, as operators of small municipal separate storm sewer systems (MS4s).

The Permit allows municipalities to discharge stormwater runoff from municipal drainage systems into the State’s waterbodies (i.e., streams, rivers, lakes, wetlands) as long as municipalities implement programs to protect water quality by reducing the discharge of “non-point source” pollutants to the “maximum extent practicable” (MEP) through application of Permit-specified “best management practices” (BMPs). The practices specified in the Permit are collectively referred to as the Stormwater Management Program (SWMP) and grouped under the following components:

- Stormwater Planning
- Public Education and Outreach
- Public Involvement and Participation
- MS4 Mapping and Documentation
- Illicit Discharge Detection and Elimination
- Controlling Runoff from New Development, Redevelopment, and Construction Sites
- Operations and Maintenance
- Source Control Program for Existing Development
- Monitoring and Assessment

The Permit requires the City to report annually (March 31st of each year) on progress in SWMP Program implementation for the prior year. The Permit also requires submittal of documentation that describes proposed SWMP Program activities for the coming year. Implementation of various Permit conditions is phased throughout the five-year Permit term from February 16, 2007 through February 15, 2012. The current Permit became effective August 1, 2019 and will expire July 31, 2024. The Department of Ecology issued the current revised Permit that became effective August 1, 2019.

This report is the City’s Stormwater Management Program (SWMP) document. The remainder of this 2023 SWMP document describes actions Gig Harbor will take to maintain compliance from January 1, 2023 through January 1, 2024.

1.2 Phased Permit Requirements

Ecology began work on the Phase II Municipal Stormwater Permit for Western Washington in the fall of 2004 and posted a preliminary draft for public comment on May 16, 2005. Ecology released a formal draft of the Permit in February 2006 and issued the final Permit on January 17, 2007. The Permit issued by Ecology became effective on February 16, 2007 and expired on February 15, 2012. The City has completed and sent to Ecology the Duty to Reapply NOI application. Ecology reissued the National Pollutant Discharge Elimination System (NPDES) municipal stormwater permits in August 2012, they will be in effect from September 2012 to July 2013. Ecology issued a revised permit that became effective in August 2019.

Ecology is phasing in many of the Permit requirements over the Permit term. On March 31 of each year, beginning in 2008, the City must:

1. Submit its SWMP document to Ecology describing compliance activities planned for the coming year.
2. Submit an annual report documenting Permit compliance activities for the previous calendar year.
3. Post the SWMP document and annual report on the City website.

This SWMP document includes the following attachments:

- Appendix A - Acronyms and Definitions from the Permit.

The Western Washington Phase II Municipal Stormwater Permit and additional information can be found on Ecology's website: <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Municipal-stormwater-general-permits/Western-Washington-Phase-II-Municipal-Stormwater>

1.3 Department Responsibilities

The Permit requirements affect departments across the City organization. The Engineering Division of the Public Works Department is the lead and coordinates tasks that may require some collaboration with Operations, Parks, and Wastewater Management as well as Community Development and City Administration. While each task may be cross-departmental, the lead department has been identified in the task tables for each Permit component in the following sections.

1.4 Total Maximum Daily Load (TMDL) Compliance Issues

Stormwater discharges covered under the Permit are required to implement actions necessary to achieve the pollutant reductions called for in applicable TMDLs. Applicable TMDLs are TMDLs which have been approved by the EPA before the issuance date of the permit or which have been approved by the EPA prior to the date the permittee's application is received by Ecology. Information on Ecology's TMDL program is available on Ecology's website at www.ecy.wa.gov/programs/wq/tmdl.

All TMDLs approved by EPA before February 15, 2006, were reviewed by Ecology to determine whether stormwater including municipal stormwater sources were identified in the TMDL. When most of these TMDLs were developed, municipal stormwater was considered a subset of non-point discharges, rather than a permitted discharge. As a result, very few TMDLs statewide contain requirements for municipal stormwater sources. Few TMDLs completed to date have established load allocations or waste load allocations for municipal stormwater discharges covered under the Permit. Ecology is interpreting TMDL requirements as follows:

- For TMDLs where stormwater was not identified as a source of the pollutants of concern, or if all of the sources were defined in the TMDL, Ecology considers the MS4 not to be a significant contributor of pollutants.
- Where stormwater was identified as a source of pollutants and the TMDL or implementation plans developed to support the TMDL identified control measures were less than or equivalent to the requirements of this permit, Ecology sets a narrative effluent limit: “compliance with the permit compliance constitutes compliance with the TMDL.”
- If stormwater was identified as a source of pollutants and specific WLAs, LAs or control measures were established, Ecology must develop effluent limits in addition to the other requirements of the permit. These effluent limits may be narrative or numeric depending on the control measures set by the TMDL or implementation plans.

Where a TMDL or the detailed implementation plan developed for the TMDL identifies actions or activities beyond what is required by this permit, Ecology has identified the additional requirements in Appendix 2 of the permit for all TMDLs approved by EPA prior to February 15, 2006. Appendix 2 of the permit lists the cities and counties affected by the TMDL.

The City of Gig Harbor has not been listed in Appendix 2.

1.5 Document Organization

The content in this document is based upon Permit requirements and Ecology’s Draft Guidance for City and County Annual Reports for Western Washington Phase II Municipal Stormwater Permits. The remainder of the Stormwater Management Program document is organized similarly to the Permit:

- **Section 2.0** addresses Permit requirements for administration of the City’s Stormwater Management Program for 2023.
- **Section 3.0** addresses Permit requirements for Stormwater Planning for 2023.
- **Section 4.0** addresses Permit requirements for Public Education and Outreach for 2023.
- **Section 5.0** addresses Permit requirements for Public Involvement and Participation for 2023.
- **Section 6.0** addresses Permit requirements for MS4 Mapping and Documentation for 2023.
- **Section 7.0** addresses Permit requirements for Illicit Discharge Detection and Elimination for 2023.
- **Section 8.0** addresses Permit requirements for Controlling Runoff from New Development, Redevelopment, and Construction Sites for 2023.
- **Section 9.0** addresses Permit requirements for Operations and Maintenance for 2023.
- **Section 10.0** addresses Permit requirements for Source Control Program for Existing Development for 2023.
- **Section 11.0** addresses Permit requirements for the Monitoring and Assessment section of the Permit for 2023.

Each section includes a summary of the relevant Permit requirements and a description of current and planned compliance activities.

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2. STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

This Section describes Permit requirements related to overall Stormwater Management Program administration, including current and planned compliance activities.

2.1 Permit Requirements

The Permit (Section S5.A) requires the City to:

- Develop and implement a Stormwater Management Program and prepare written documentation (SWMP document) for submittal to Ecology on March 31, 2008; and update the SWMP annually thereafter. The purpose of the Stormwater Management Program is to reduce the discharge of pollutants from the municipal stormwater system to the maximum extent practicable (MEP) thereby protecting water quality. The Stormwater Management Program is to include the actions and activities described in Sections 3 through 11 of this SWMP document.
- Submit annual reports beginning in 2008 to Ecology by March 31st (for the previous calendar year). These reports are to summarize SWMP implementation status and present information from assessment and evaluation activities conducted during the reporting period.

2.2 Current Activities

The City currently has in place activities and programs that meet the Permit requirements. Current activities associated with the above Permit requirements include:

- The City is on track to comply with Ecology's requirements for submittal of the SWMP documentation by March 31, 2023. The Engineering Division is currently leading City development of the future planned activities.
- The City has defined its strategy for cost tracking.
- The City has set up systems for tracking trainings, inspections, enforcement actions, and public education activities.
- The City has been active in coordination among permittees.

2.3 Planned Activities

Gig Harbor has positioned itself well to maintain compliance as Ecology phases in the future Permit deadlines. Table 2-1 presents the proposed work plan for the 2023 SWMP administration activities. These tasks were developed through an interactive process with staff from affected City departments.

Table 2-1. 2023 Stormwater Management Administration Program Work Plan			
Task ID	Task Description	Lead	Schedule Notes
SWMP-1	Summarize annual activities for "Stormwater Management Program" component of Annual Report; identify any updates to SWMP document.	Engineering	The SWMP and Annual Compliance Report are due on or before March 31st of each year.
SWMP-2	Refine the implemented NPDES cost accounting strategy for time spent on each component of Permit.	Engineering/Finance	Continue to refine cost tracking procedures throughout 2023.
SWMP-3	Continue to refine and implement training.	Engineering/Operations	Continuously provide and track staff stormwater trainings.
SWMP-4	Coordinate among municipal permittees.	Engineering	Continuous networking with West Sound Stormwater Outreach Group; KGI Watershed Council; South Sound, West Sound, and Central Phase II Coordinator's Groups; APWA Stormwater Group

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3. STORMWATER PLANNING

This Section describes the Permit requirements related to Stormwater Planning, including current and planned compliance activities.

3.1 Permit Requirements

The Permit (Section S5.C.1) requires the City to:

- Convene an inter-disciplinary team to inform and assist in the development, progress, and influence of this program.
- Describe how stormwater needs and protection/improvement of receiving waters are informing the planning update process and influencing policy and strategies.
- Require LID principles and BMPs when updating, revising, and developing new local development codes, rules, standards, and other enforceable documents.
- Complete receiving water assessment, prioritization, and development of a Stormwater Management Action Plan (SMAP) by March 31, 2023.

3.2 Current Activities

The current compliance activities associated with the above Permit requirements include:

- The City has convened an inter-disciplinary team that informs and assists in development, progress, and influence of this program. This team includes City staff from both Public Works and Community Development.
- The City requires that LID principles and BMPs are the preferred and a commonly-used approach to site development. Requirements are found in the City's current Stormwater Management and Site Development Manual and the Gig Harbor Municipal Code.
- The City has completed work on the Stormwater Management Action Plan (SMAP) and was adopted on November 28, 2022 by Ordinance 1501, incorporating it into the Comprehensive Plan as Appendix F. The SMAP identifies North Creek as Gig Harbor's priority basin and outlines short-term and long-term actions the City will take to protect it. The goal of the SMAP is to assure the City's stormwater management program protects residents and properties from flooding, provides for planned growth, preserves and protects water quality in streams, wetlands, and marine environments, promotes habitat access and utilization, and satisfies the City's regulatory obligations under the Permit.

3.3 Planned Activities

Table 3-1 is the work plan for 2023 stormwater planning activities. These tasks were developed through an interactive process with staff from affected City departments.

Table 3-1. 2023 Stormwater Planning Work Plan			
Task ID	Task Description	Lead	Schedule Notes
SWPL-1	Convene interdisciplinary team to assist in development, progress, and influence of this program.	Engineering	Completed August, 2020
SWPL-2	The City to adopt and make effective code revisions and a new Stormwater Management and Site Development Manual; revised so that LID is the preferred and commonly-used approach for site development.	Engineering/Planning	Completed (Required by December 31, 2016)
SWPL-3	The City to finalize the provisions to verify adequate long-term operation and maintenance of permitted stormwater treatment and flow control facilities.	Engineering/Planning	Completed (Required by December 31, 2016)
SWPL-4	Create table of local receiving waters most likely to benefit from stormwater management planning.	Engineering/Planning	Completed February, 2022
SWPL-5	Develop and implement a prioritization method and process to determine which receiving waters will receive the most benefits from retrofits, SWMP actions, and other management actions.	Engineering/Planning	Completed February, 2022
SWPL-6	Develop a SMAP for at least one high priority catchment area.	Engineering/Planning	Completed November, 2022

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4. PUBLIC EDUCATION AND OUTREACH

This Section describes the Permit requirements related to Public Education and Outreach, including current and planned compliance activities.

4.1 Permit Requirements

The Permit (Section S5.C.2) requires the City to:

- Prioritize and target education and outreach activities to specified audiences, including general public, businesses, residents/homeowners, landscapers, property managers, engineers, contractors, developers, review staff and land use planners, and other City employees to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
- Have an outreach program that is designed to achieve measurable improvements in the target audience's understanding of the problem and what they can do to solve it.
- Track and maintain records of public education and outreach activities.

4.2 Current Activities

The COVID-19 pandemic has affected many aspects of the City's Permit implementation, but it has impacted the City's Public Education and Outreach program the most. During this time, the City has had to adjust its approach to reach the public and meet Permit requirements without being in person. Where effective and appropriate, these new approaches that have been developed will continue alongside reemerging in-person activities. Future events will be dependent on State regulations.

The current compliance activities associated with the above Permit requirements include:

- The City currently has an Interlocal Agreement with Kitsap County to form the West Sound Stormwater Outreach Group (WSSOG) to work on Education and Outreach campaigns. Efforts include behavior change programs for reducing pet waste and chemical fertilizers as well as raising general awareness through the Puget Sound Starts Here campaign. There are 30 Mutt Mitt stations provided throughout the City with refill bags donated by local business Mud Bay on a continuous basis. Virtual webinars for Natural Yard Care were hosted by Master Gardeners with local retailers offering discounts on organic lawn food. An expanded series and possible in-person events are planned for 2023. Gig Harbor and WSSOG will evaluate and report on the behavior change campaigns including results and recommended changes by March 31, 2024 according to Permit requirements.
- The City is in partnership with the Pierce Conservation District. We plan to offer a Rain Barrel Workshop in the spring that will be open to the public, to provide education on rainwater harvesting, and reducing the runoff to storm systems. The partnership assures that their expertise will be available in organizing volunteer environmental enhancement events, providing additional public education and outreach and rendering technical assistance to the public. The City will continue to provide public education and outreach regarding water quality problems and track activities as they are implemented throughout 2023.
- The City is in partnership with the Key Peninsula-Gig Harbor-Islands Watershed Council. Efforts include hosting an annual State of the Watershed and participating in community field trips.

- The City is in partnership with Harbor WildWatch and plans to start a Stormwater Series Workshop for grades K-12. Harbor WildWatch has already implemented multiple classroom educational workshops, including a geology series and water series. Each series meets national STEM standards and align with the Washington State Next Generation Science Standards (NGSC). The City is excited to partner with Harbor WildWatch and add a stormwater series. Workshops are anticipated to start in 2023.
- The City has created a Stormwater Story Map using ArcGIS that provides a high-level overview of stormwater, regulations, and what the City is doing regarding stormwater. The Story Map is available to the public on the City website and used as an education and outreach tool.
- The City provides a storm drain catch basin marker installation program containing the message “Only Rain Down the Storm Drain” for volunteers and developers to install.
- The City provides multiple educational signs throughout the community including topics such as streams, wetlands, and our local watershed.
- The City has created a quarterly stormwater newsletter titled “The RunOff” which educates the public on stormwater issues and highlights a local “stormwater hero”.

4.3 Planned Activities

The City will continue providing and building its Education and Outreach program in 2023. Gig Harbor will continue to take advantage of regional efforts intended to meet NPDES permit requirements. Continue working with the groups Stormwater Outreach for Regional Municipalities (STORM), Pierce Conservation District, South Sound, West Sound and Central Phase II Coordinator’s Groups, Tacoma-Pierce County Health Department, Key Peninsula-Gig Harbor-Islands (KGI) Watershed Council, West Sound Stormwater Outreach Group (WSSOG), and Harbor WildWatch, thereby gaining more unified messages, cost-saving due to scale and reducing City efforts and overall costs. Table 4-1 is the work plan for 2023 SWMP public education and outreach activities. These tasks were developed through an interactive process with staff from affected City departments.

Table 4-1. 2023 Public Education and Outreach Work Plan			
Task ID	Task Description	Lead	Schedule Notes
EDUC-1	Continue to implement and promote our education and outreach plan. Advertise stormwater pollution hotline, Story Map, newsletter, practical stormwater information and BMPs on City website.	Engineering	Continue implementing education and outreach programs and events throughout the year.
EDUC-2	Continue to implement the Pet Waste Campaign, the spill hotline, and the STORM Puget Sound Starts Here coaster and cup holder outreach giveaway program.	Engineering/West Sound Stormwater Outreach Group (WSSOG)	
EDUC-3	Provide Natural Yard Care Workshops to public.	Engineering/WSSOG	
EDUC-4	Provide Rain Barrel Workshop to the public.	Engineering/Pierce Conservation District	
EDUC-5	Continue quarterly stormwater newsletter.	Engineering	
EDUC-6	Implement stormwater education and outreach at events including the Donkey Creek Chum Salmon Festival, Puyallup Fair Stormwater booth, YMCA Health Living Expo, Harbor Hounds, and State of the Watershed as events allow.	Engineering/Pierce Conservation District/ Harbor WildWatch	

EDUC-7	Create Stormwater Series Workshop for K-12 graders in partnership with Harbor WildWatch.	Engineering/Harbor WildWatch	Start 2023.
EDUC-8	Provide education and outreach to private storm system owners on maintenance, specifically Home Owner Associations.	Engineering	Ongoing
EDUC-9	Support a salmon counting station for the public to participate in, located at Donkey Creek Park.	Engineering/Harbor WildWatch	To be in place during salmon run.
EDUC-10	Summarize annual activities for "Public Education and Outreach" component of Annual Report; identify any updates to SWMP document.	Engineering	The SWMP and Annual Report submittal is due on or before March 31st of each year.

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5. PUBLIC INVOLVEMENT AND PARTICIPATION

This Section describes the Permit requirements related to Public Involvement and Participation, including current and planned compliance activities.

5.1 Permit Requirements

The Permit (Section S5.C.3) requires the City to:

- Provide ongoing opportunities for public involvement through advisory boards, council meetings, watershed committees, public participation, stewardship programs, environmental activities or other similar activities. The public must be able to participate in the decision-making processes involving the development, implementation and update of the Stormwater Management Program.
- Make the SWMP document and Annual Report available to the public and posted on the City's website. Make other documents required to be submitted to Ecology in response to Permit conditions available to the public.

5.2 Current Activities

The current compliance activities associated with the above Permit requirements include:

- The City implemented a series of public involvement activities intended to meet the Permit requirements for public involvement in development of its current SWMP. This process involved presentations to the City Administrator and City Council at sessions open to the public.
- The City regularly attends Key Peninsula-Gig Harbor-Islands (KGI) Watershed Council to discuss projects and to share information on preserving, improving and the current health of the watershed. This meeting is open to and attended by the public and their ideas and comments are welcomed.
- The City website contains the 2018 Stormwater Comprehensive Plan, current Stormwater Management and Site Development Manual, Ordinance 1168 Illicit Discharge Detection and Elimination (IDDE), and Ordinance 1169 Code Revisions to Stormwater, Grading and Civil Permits, all of which the public may offer comments on to City staff, at City Council Meetings and to the Mayor.
- The City posted the current SWMP document and Annual Report to the Department of Ecology on the City website.
- The City is in partnership with Pierce Conservation District and provides a local Stream Team for Donkey Creek as part of volunteer/stewardship opportunities.

5.3 Planned Activities

Gig Harbor will offer the public opportunities to be involved in the decision-making process on stormwater issues. Actions recommended for continued compliance include:

- Make most current SWMP document and Annual Report available to the public by posting on the City's website.
- Post public activities and meeting dates on the City's website and social media accounts.

Table 5-1 is the work plan for 2023 SWMP public involvement activities. These tasks were developed through an interactive process with staff from affected City departments.

Table 5-1. 2023 Public Involvement Work Plan			
Task ID	Task Description	Lead	Schedule Notes
PI-1	Provide public involvement opportunities for annual SWMP update.	City Administration/ Engineering	Public involvement opportunities will be available before March 31 st submittal.
PI-2	Continue to be an active member of the KGI Watershed Council and encourage public involvement in watershed planning and improvements.	Engineering/KGI Watershed Council	
PI-3	Make SWMP document and Annual Report available to public by posting on the City website.	Engineering	
PI-4	Provide public with activity and meeting dates via City webpages.	City Administration/Engineering	
PI-5	Summarize annual activities for "Public Involvement and Participation" component of Annual Report; identify any updates to SWMP document.	Engineering	The SWMP and Annual Report submittal is due on or before March 31 st of each year.

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6. MS4 MAPPING AND DOCUMENTATION

This Section describes the Permit requirements related to MS4 Mapping and Documentation including current and planned compliance activities.

6.1 Permit Requirements

The Permit (Section S5.C.4) requires the City to:

- Maintain mapping data for known MS4 assets:
 - Outfalls and discharge points
 - Receiving waters (other than groundwater)
 - Stormwater treatment and flow control BMPs/facilities owned and operated by the City
 - Geographic areas served by the MS4 that do not discharge stormwater to surface waters
 - Tributary conveyances to all known outfalls and discharge points with a 24-inch nominal diameter or larger
 - Connections between the MS4 owned or operated by the City and other municipalities or public entities
 - All connections to the MS4 authorized or allowed by the City after February 16, 2007
- Begin to collect size and material for all known MS4 outfalls and complete mapping of all known connections from the MS4 to a privately-owned stormwater system.
- Require electronic format for mapping and provide mapping information upon request.

6.2 Current Activities

The current compliance activities associated with the above Permit requirements include:

- The City currently implements activities and programs that meet many of the Permit requirements.
 - City employs its own geographic information system (GIS), mapping system, asset management, and updates as new development is complete.
 - Gig Harbor maps are available in electronic format and will be provided as needed.
 - Provide maps upon request to other jurisdictions or by public record requests.
 - Add and analyze mapped stormwater assets, including updated basins, outfalls, ponds, etc.
 - Create map showing area where City receives stormwater from Pierce County and discharges back to Pierce County.
- The City has continued to use and implement GIS applications for collecting stormwater infrastructure data. GIS continues to use integrations with the City's asset management software, Cartegraph, to connect field and desktop data and keep all information up to date. Stormwater as-builts and record drawings from City and private development projects continue to be added to GIS data. The combination of data integration, project data digitization and staff web mapping capabilities has greatly assisted in the City's plan review process, and in helping to prioritize stormwater work. The City's stormwater department also

utilized GIS to assist in the Stormwater Management Action Planning (SMAP) process. Using GIS, the City updated its storm water basins and integrated numerous data into that basin layer for analysis. Such data includes development, population, City regulation layers, and assets per basin.

- The GIS Story Maps is a useful tool in public outreach. The Stormwater department compiled the raw asset data, educational materials, and links to other resources and tied them all together in a web presentation for public review. This story map is available on the City’s website and will be updated accordingly.
- GIS applications were used in the development of the Source Control Business Inspection inventory, forms, and data management. These tools will continue to be improved as lessons are learned during initial implementation in 2023.

6.3 Planned Activities

Gig Harbor is continuously working on updating and maintaining GIS and data systems. Table 6-1 is the work plan for 2023 SWMP MS4 Mapping and Documentation. These tasks were developed through an interactive process with staff from affected City departments.

Table 6-1. 2023 MS4 Mapping and Documentation Work Plan			
Task ID	Task Description	Lead	Schedule Notes
MAP-1	Quality analysis on current data through field verification and as-built drawings. Confirm and update data via asset management program.	Engineering	GIS stormwater mapping is complete and is updated when new facilities are built.
MAP-2	Use high accuracy GPS to enhance stormwater system data and begin comprehensive mapping of known missing elements.	Engineering	
MAP-3	Collection of size and material for all known MS4 outfalls.	Engineering	Completed July 2020
MAP-4	Develop Business Inspection field application using GIS and Survey123.	Engineering	Field application completed; implementation began in January 2023.
MAP-5	Complete mapping of all known connections from the MS4 to a privately owned stormwater system.	Engineering	Currently evaluating; due August 1, 2023

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7. ILLICIT DISCHARGE DETECTION AND ELIMINATION

This Section describes the Permit requirements related to Illicit Discharge Detection and Elimination (IDDE), including current and planned compliance activities.

7.1 Permit Requirements

The Permit (Section S5.C.5) requires the City to:

- Implement an ongoing program to prevent, detect, characterize, trace, and eliminate illicit connections and illicit discharges into the MS4.
- Include procedures for reporting and correcting or removing illicit connections, spills and other illicit discharges when they are suspected or identified.
- Inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.
- Develop a storm sewer system map, have ordinances that prohibit illicit discharges, and create a program to detect and address illicit discharges.
- Publicly list and publicize a hotline or other local telephone number for public reporting of spills and other illicit discharges. Track illicit discharge reports and actions taken in response through close-out, including enforcement actions.
- Train staff on proper IDDE response procedures and to recognize and report illicit discharges.
- Summarize all illicit discharges and connections reported to the City and response actions taken, including enforcement actions, in the Annual Report; including updates to the SWMP document.

7.2 Current Activities

The City currently implements activities and programs that meet many of the Permit requirements. The current compliance activities associated with the above Permit requirements include:

- The City enforces the adopted Ordinance 1168 Illicit Discharge Detection and Elimination (IDDE).
- The City has open communication with Pierce County in the event of a transfer of pollutants from one jurisdiction's storm sewer to the other's storm sewer.
- The City has emergency phone numbers posted on the City's website that allows citizens to report pollution spills, illicit discharges or illicit dumping. The City responds to the calls received, clean up actions are taken as needed, and incidents are tracked in City asset database.
- The City notifies Ecology of known spills and key City personnel are notified to respond to spills reported to Ecology through the Environmental Report Tracking System (ERTS).
- The City employs its own GIS map of the City's MS4 system. The map is updated using development record drawings and GPS survey data. All IDDE events are mapped to show potential hot spots.
- City codes and standards have sections that address illicit discharges and civil infractions.
- The City summarizes associated activities in its Annual Report by March 31st of each year.

7.3 Planned Activities

Gig Harbor conducts illicit discharge detection and elimination activities and will continue to expand efforts in order to maintain compliance as Ecology phases in Permit requirements. Table 7-1 is the work plan for 2023 SWMP illicit discharge detection and elimination activities. These tasks were developed through an interactive process with staff from affected City departments.

Table 7-1. 2023 Illicit Discharge Detection and Elimination Work Plan			
Task ID	Task Description	Lead	Schedule Notes
IDDE-1	Continue to implement City-wide IDDE Program and revise IDDE response, monitoring, and inspections as needed.	Engineering	Ongoing program that was developed in 2011.
IDDE-2	Use the City GIS Storm Drainage Inventory map to investigate, track and record spills. Observe waterways that are affected and any hot spot areas.	Engineering	Ongoing
IDDE-3	Adopted IDDE Ordinance that defines current IDDE response process into a standard, City-wide IDDE response and enforcement process and procedure.	Engineering/Operations/Legal	Ordinance 1168 adopted August 2009.
IDDE-4	Continue training of municipal field staff on the identification, investigation, termination, cleanup, and reporting of illicit discharges, improper disposal and illicit connections.	Engineering/Operations	Provide and track training for municipal field staff as needed.
IDDE-5	Incorporate awareness of illicit discharges into public outreach and education program.	Engineering	Ongoing
IDDE-6	Summarize annual activities for "Illicit Discharge Detection and Elimination" component of Annual Report; identify any updates to SWMP document.	Engineering/Operations	The SWMP and Annual Report submittal is due on or before March 31st of each year.

CITY OF GIG HARBOR 2023 STORMWATER MANAGEMENT PROGRAM

8. CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, AND CONSTRUCTION SITES

This Section describes the Permit requirements related to Controlling Runoff from New Development, Redevelopment and Construction Sites, including current and planned compliance activities.

8.1 Permit Requirements

The Permit (Section S5.C.6) requires the City to:

- Develop, implement, and enforce a program to reduce pollutants in stormwater runoff (for example, sediment, construction site wastes, and illicit discharges) to the municipal separate storm sewer system from new development, redevelopment and construction site activities. The program must apply to both private and public projects, including roads, and address all construction/development-associated pollutant sources.
- Adopt regulations (codes and standards) and implement plan review, inspection, and escalating enforcement processes and procedures necessary to implement the program in accordance with Permit conditions, including the minimum technical requirements in Appendix 1 of the Permit (i.e., 2012 Ecology Stormwater Management Manual for Western Washington, equivalent Phase I Manual or one of the Manual options with a Gig Harbor-specific basin-planning overlay).
- Provide provisions and processes and procedures (plan review, inspection, and enforcement) to allow non-structural preventive actions and source reduction approaches such as Low Impact Development techniques (LID), measures to minimize the creation of impervious surfaces and measures to minimize the disturbance of native soils and vegetation.
- Adopt regulations (codes and standards) and provide provisions to verify adequate long-term operations and maintenance of new post-construction permanent stormwater facilities and best management practices (i.e., private drainage system inspections) in accordance with Permit conditions, including an annual inspection frequency and/or approved alternative inspection frequency and maintenance standards for private drainage systems as protective as those in Chapter IV of the 2012 Ecology Stormwater Management Manual for Western Washington.
- Provide training to staff on the new codes, standards, processes and procedures and create public outreach and education materials.
- Develop and define a process to record and maintain all inspections and enforcement actions by staff for inclusion in the Annual Report.
- Summarize annual activities for the “Controlling Runoff” component of the Annual Report; identify any update to SWMP document.

8.2 Current Activities

The City currently has activities and programs that meet many of the Permit requirements. Current compliance activities associated with the above Permit requirements include:

- The City has developed and implemented a program to reduce pollutants in stormwater runoff to the municipal separate storm sewer system from some development and construction site activities. The City enforces this program through the Gig Harbor Municipal Code including the Stormwater Management Chapter and the Illicit Discharge Detection and Elimination Chapter.
- The City requires submittal of Temporary Erosion and Sediment Control (TESC) plans and stormwater drainage plans (i.e., for stormwater quantity control, runoff treatment facilities, and conveyance requirements) of private development and City capital improvement projects. The City requires and tracks construction stormwater permits for private development.
- The City conducts regular construction and stormwater site inspections during the pre-construction and construction phases and documents the inspections in our SmartGov permit database. The City coordinates with Code Enforcement to issue Stop Work Orders or other penalties to projects that cause illicit discharges.
- The City requires stormwater easements that grant the City access to the private storm facilities of permitted new developments.
- The City provides copies of Notices of Intent (NOI) for construction and industrial activities during the permit review process with developers.
- The City summarizes associated activities in its Annual Report by March 31st, of each year.

8.3 Planned Activities

Gig Harbor has a program to help reduce stormwater runoff from new development and construction sites, but updates will be necessary to maintain compliance as Ecology phases in Permit requirements. Table 8-1 is the work plan for 2023 SWMP activities related to control of runoff from new development, redevelopment and construction sites. These tasks were developed through an interactive process with staff from affected City departments.

Table 8-1. 2023 Controlling Runoff from Development, Redevelopment, and Construction Sites Work Plan			
Task ID	Task Description	Lead	Schedule Notes
CTRL-1	Continue implementation of the current Gig Harbor Stormwater Management and Site Development Manual requirements, standards and BMPs for development projects.	Engineering/Planning/ Legal	Manual became effective 12/31/2016. Update to manual planned to be completed by 6/1/2023
CTRL-2	Use Engineering Stormwater Plan Review checklist to ensure department is consistent and following current Gig Harbor Stormwater Management and Site Development requirements.	Engineering	Ongoing
CTRL-3	Complete a LID Gap Analysis, revise the City Municipal Code, adoption of a new Stormwater Manual and Design Details that make LID techniques the preferred and common development method.	Engineering/Planning/ Building/Legal	Became effective December 2016.

CTRL-4	Adopt codes and standards to establish a program that will verify adequate long-term operations and maintenance of new post-construction permanent stormwater facilities and BMPs.	Engineering	Elements are currently in place with additional refinement in 2023.
CTRL-5	Continue to deploy system for project record keeping regarding plan review, construction site inspections, and enforcement actions.	Engineering/Building/IT	SmartGov permit management program is used.
CTRL-6	Incorporate Cartegraph asset management software to stormwater maintenance program.	Engineering	Expand and refine use in 2023.
CTRL-7	Continue to train staff responsible for implementing the controlling runoff program from new development, redevelopment, and construction sites.	Engineering	Provide and track training.

CITY OF GIG HARBOR 2023 STORMWATER MANAGEMENT PROGRAM

9. OPERATION AND MAINTENANCE FOR MUNICIPAL OPERATIONS

This Section describes the Permit requirements related to Operation and Maintenance for Municipal Operations, including current and planned compliance activities.

9.1 Permit Requirements

The Permit (Section S5.C.7) requires the City to:

- Develop and implement an operations and maintenance (O&M) program with the goal of preventing or reducing pollutant runoff from the municipal separate stormwater system and municipal operations and maintenance activities.
- Establish maintenance standards for the municipal separate stormwater system that are at least as protective as those specified in the 2019 *Stormwater Management Manual for Western Washington*.
- Perform inspection of stormwater flow control and treatment facilities and catch basins at the required frequencies, unless previous inspection data show that a reduced frequency is justified.
- Have procedures in place to reduce stormwater impacts associated with runoff from municipal operation and maintenance activities for streets, parking lots, roads or highways owned or maintained by the City, and to reduce pollutants in discharges from all lands owned or maintained by the City.
- Train staff to implement the modified processes and procedures and document that training.
- Prepare and update a Stormwater Pollution Prevention Plan (SWPPP) for the Public Works Operations Facility owned and operated by the City.
- Summarize annual activities for the “Pollution Prevention and Operations and Maintenance for Municipal” component of the Annual Report; identify any update to SWMP document.

9.2 Current Activities

The City currently has activities and programs that meet the Permit requirements. The current compliance activities associated with the above Permit requirements include:

- The City has a program for detention facilities, catch basin and inlet annual inspections and maintenance.
- Many of the City’s landscape, open space, and facility management activities are managed to minimize the potential for stormwater pollution.
- The City Public Works Operations Facility is subject to the Stormwater Pollution Prevention Plan (SWPPP).
- Stormwater outfall maintenance is planned to replace or improve outfalls that have deteriorated due to tidal action or lack of maintenance. Outfalls have been inspected and prioritization has been assigned with assistance from Department of Fish and Wildlife. The City summarizes associated activities in its Annual Report by March 31st of each year.

9.3 Planned Actions

Gig Harbor performs many activities to limit stormwater pollution potential related to its municipal operations and maintenance program. However, updates will be necessary to maintain compliance as Ecology phases in Permit requirements. Table 9-1 is the work plan for 2023 SWMP activities related to pollution prevention and operations and maintenance activities. These tasks were developed through an interactive process with staff from affected City departments.

Table 9-1. 2023 Operations and Maintenance Work Plan			
Task ID	Task Description	Responsible	Schedule Notes
OM-1	Update municipal storm system inspection and operations and maintenance processes and procedures per current Gig Harbor Stormwater Management and Site Development maintenance standards.	Engineering/Operations	Standards were adopted on 12/31/2016. Update to manual planned to be completed by 6/1/2023.
OM-2	Refine data management systems to track maintenance activities and inspections.	Engineering/Operations	Stormwater asset management program is being utilized.
OM-3	Continue annual inspection program for City-owned flow control and runoff treatment facilities and perform identified maintenance within prescribed Permit timelines.	Engineering/Operations	
OM-4	Implement the Stormwater Pollution Prevention Plan for the Public Works Operations Facility. Revise and refine procedures as necessary.	Engineering/Operations	Update SWPPP as needed.
OM-5	Develop and establish policies and procedures to reduce pollutants in stormwater discharges from lands owned or maintained by the City.	Engineering/Operations	
OM-6	Develop curricula and define staff training requirements for pollution prevention training program.	Engineering/Operations	Continue to provide training for Operations staff.
OM-7	Track Washington Fish and Wildlife Hydraulic Project Approval permitted stormwater facilities maintenance.	Engineering/Operations	As needed.
OM-8	Summarize annual activities for "Pollution Prevention and Operation and Maintenance" component of Annual Report; identify any updates to SWMP document.	Engineering/Operations	The SWMP and Annual Report submittal is due on or before March 31st of each year.

CITY OF GIG HARBOR 2023 STORMWATER MANAGEMENT PROGRAM

10. SOURCE CONTROL PROGRAM FOR EXISTING DEVELOPMENT

This Section describes the Permit requirements related to Source Control Program for Existing Development, including current and planned compliance activities.

10.1 Permit Requirements

The Permit (Section S5.C.8) requires the City to:

- Adopt and make effective an ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources using sources control BMPs in the SWMMWW or Ecology-approved Phase I Program. Require applicable operational source BMPs for all pollutant generating sources and structural source control BMPs if operational source control BMPs are inadequate.
- Establish an inventory that identifies publicly and privately owned institutional, commercial, and industrial sites which have the potential to generate pollutants to the MS4. Implement an inspection program for business inventory starting January 1, 2023.
- Implement a progressive enforcement policy that requires sites to comply with stormwater requirements within a reasonable time period. Maintain records and provide procedures, techniques, and requirements to staff.

10.2 Current Activities

The City currently has activities and programs that meet the Permit requirements. The current compliance activities associated with the above Permit requirements include:

- The City has developed and implemented a program to reduce source control for existing development and enforces this program through the Gig Harbor Municipal Code Stormwater Management Chapter.
- The City has completed a business inventory and will manage and update the inventory list as needed.
- The City has begun implementing a Source Control Inspection program for its business inventory.

10.3 Planned Actions

Gig Harbor will manage and update inventory as necessary to maintain compliance with Permit requirements. Table 10-1 is the work plan for 2023 SWMP activities related to source control program for existing development. These tasks were developed through an interactive process with staff from affected City departments.

Table 10-1. 2023 Source Control Program for Existing Development Work Plan			
Task ID	Task Description	Responsible	Schedule Notes
SCPED-1	Continue to update and manage the City business inventory.	Engineering	Ongoing
SCPED-2	Educate and inform local businesses about upcoming business source control inspections.	Engineering	Started outreach in January 2020 and will continue as Source Control program is implemented.
SCPED-3	Create business inventory, inspection, and compliance program.	Engineering	Completed. Inspections began in January 2023.
SCPED-4	Update municipal code as needed to require compliance from local business.	Engineering	Ordinance 1490 adopted July 2022. Will update as necessary based on inspections.

CITY OF GIG HARBOR 2023 STORMWATER MANAGEMENT PROGRAM

11. MONITORING AND ASSESSMENT

This Section describes the Permit requirements related to water quality monitoring, including current and planned activities.

11.1 Permit Requirements

The Permit (Sections S7 and S8) requires the City to:

- Monitor water quality for compliance with TMDLs [total maximum daily pollutant loads, a.k.a., water quality clean-up plans].
- Either conduct stormwater discharge monitoring per Permit Section S8.C or pay into the Stormwater Action Monitoring (SAM) program. SAM conducts status and trends monitoring of regional receiving water as well as effectiveness and source identification studies. The City has elected to make annual payments to SAM to satisfy this Permit requirement.

11.2 Current Activities

The City’s current Permit does not include TMDL requirements because there were no EPA-approved TMDLs affecting the City prior to the cut-off date for inclusion in the current Permit (See Appendix 2 of the Permit for applicable TMDLs).

The City has elected to make annual payments to SAM to satisfy the monitoring and assessment Permit requirements.

11.3 Planned Activities

Gig Harbor will continue to participate in the SAM program. Table 8-1 presents the work plan for 2023 SWMP monitoring activities. These tasks were developed through a process of interviews and meetings with staff from affected City departments.

Table 11-1. 2023 Water Quality Monitoring Work Plan			
Task ID	Task Description	Lead	Schedule Notes
MNTR -1	The City will contribute to the collective fund to support the implementation of SAM.	Engineering	Contribute annually to support implementation of SAM.
MNTR -2	Summarize annual monitoring activities for the Annual Report; identify any updates to the SWMP document.	Engineering	The SWMP and Annual Report submittal is due on or before March 31st of each year.

APPENDIX A

Acronyms and Definitions

The following definitions and acronyms are taken directly from the Phase II Permit and are reproduced here for the reader's convenience.

AKART means all known, available, and reasonable methods of prevention, control and treatment. **All known, available and reasonable methods of prevention, control and treatment** refers to the State Water Pollution Control Act, Chapter 90.48.010 and 90.48.520 RCW.

Basin Plan is a surface water management process consisting of three parts: a scientific study of the basin's drainage features and their quality; developing actions and recommendations for resolving any deficiencies discovered during the study; and implementing the recommendations, followed by monitoring.

Best Management Practices ("BMPs") are the schedules of activities, prohibitions of practices, maintenance procedures, and structural and/or managerial practices approved by the Department that, when used singly or in combination, prevent or reduce the release of pollutants and other adverse impacts to waters of Washington State.

BMP means Best Management Practice.

Component or **Program Component** means an element of the Stormwater Management Program listed in S5 Stormwater Management Program for Cities, Towns, and Counties or S6 Stormwater Management Program for Secondary Permittees of this permit.

CWA means Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972) Pub.L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. (6-483 and Pub. L. 97-117, 33 U.S.C. 1251 et.seq.

Discharge for the purpose of this permit means, unless indicated otherwise, any discharge from a MS4 owned or operated by the permittee.

Ecology's Western Washington Phase I Municipal Stormwater Permit regulates discharges from municipal separate storm sewers owned or operated by Clark, King, Pierce and Snohomish Counties, and the cities of Seattle and Tacoma.

Ecology's Western Washington Phase II Municipal Stormwater Permit covers certain "small" municipal separate stormwater sewer systems.

Entity means another governmental body, or public or private organization, such as another permittee, a conservation district, or volunteer organization.

Equivalent document means a technical stormwater management manual developed by a state agency, local government or other entity that includes the Minimum Technical Requirements in Appendix 1 of this Permit. The Department may conditionally approve manuals that do not include the Minimum Technical Requirements in Appendix 1; in general, the Best Management Practices (BMPs) included in those documents may be applied at new development and redevelopment sites, but the Minimum Technical Requirements in Appendix 1 must still be met.

Heavy equipment maintenance or storage yard means an uncovered area where any heavy equipment, such as mowing equipment, excavators, dump trucks, backhoes, or bulldozers are washed or maintained, or where at least five pieces of heavy equipment are stored.

Illicit connection means any man-made conveyance that is connected to a municipal separate storm sewer without a permit, excluding roof drains and other similar type connections. Examples include sanitary sewer

connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the municipal separate storm sewer system.

Illicit discharge means any discharge to a municipal separate storm sewer that is not composed entirely of storm water except discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges resulting from fire fighting activities.

IDDE- Illicit discharge detection and elimination

Low Impact Development (LID) means a stormwater management and land development strategy applied at the parcel and subdivision scale that emphasizes conservation and use of on-site natural features integrated with engineered, small-scale hydrologic controls to more closely mimic pre-development hydrologic functions.

Major Municipal Separate Storm Sewer Outfall means a municipal separate storm sewer outfall from a single pipe with an inside diameter of 36 inches or more, or its equivalent (discharge from a single conveyance other than circular pipe which is associated with a drainage area of more than 50 acres); or for municipal separate storm sewers that receive stormwater from lands zoned for industrial activity (based on comprehensive zoning plans or the equivalent), an outfall that discharges from a single pipe with an inside diameter of 12 inches or more or from its equivalent (discharge from other than a circular pipe associated with a drainage area of 12 acres or more).

Material Storage Facilities means an uncovered area where bulk materials (liquid, solid, granular, etc.) are stored in piles, barrels, tanks, bins, crates, or other means.

Maximum Extent Practicable (MEP) refers to paragraph 402(p)(3)(B)(iii) of the federal Clean Water Act which reads as follows: Permits for discharges from municipal storm sewers shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques, and system, design, and engineering methods, and other such provisions as the Administrator or the State determines appropriate for the control of such pollutants.

MEP means Maximum Extent Practicable.

MTRs means Minimum Technical Requirements.

Municipal Separate Storm Sewer System (MS4) means a conveyance, or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains):

(i) owned or operated by a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State Law) having jurisdiction over

disposal of wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States.

(ii) designed or used for collecting or conveying stormwater.

(iii) which is not a combined sewer; and (iv) which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

National Pollutant Discharge Elimination System (NPDES) means the national program for issuing, modifying, revoking, and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of the Federal Clean Water Act,

for the discharge of pollutants to surface waters of the state from point sources. These permits are referred to as NPDES permits and, in Washington State, are administered by the Washington Department of Ecology.

Notice of Intent (NOI) means the application for, or a request for coverage under this General Permit pursuant to WAC 173-226-200.

Outfall means point source as defined by 40 CFR 122.2 at the point where a municipal separate storm sewer discharges to waters of the State and does not include open conveyances connecting two municipal separate storm sewer systems, or pipes, tunnels, or other conveyances which connect segments of the same stream or other waters of the State and are used to convey waters of the State.

O&M- Operations and Maintenance

Permittee unless otherwise noted, the term “Permittee” includes Permittee, Co-Permittee, and Secondary Permittee, as defined below:

(i) A “Permittee” is a city, town, or county owning or operating a regulated small MS4 applying and receiving a permit as a single entity.

(ii) A “Co-Permittee” is any operator of a regulated small MS4 that is applying jointly with another applicant for coverage under this Permit. Co-Permittees own or operate a regulated small MS4 located within or adjacent to another regulated small MS4.

(iii) A “Secondary Permittee” is an operator of regulated small MS4 that is not a city, town or county.

Small Municipal Separate Storm Sewer System or Small MS4 is a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels and/or storm drains which is:

a. Owned or operated by a city, town, county, district, association or other public body created pursuant to State law having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under State law such as a sewer districts, flood control districts or drainage districts, or similar entity.

b. Designed or used for collecting or conveying stormwater.

c. Not a combined sewer system,

d. Not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

e. Not defined as “large” or “medium” pursuant to 40 CFR 122.26(b)(4) & (7) or designated under 40 CFR 122.26 (a)(1)(v).

Small MS4s include systems similar to separate storm sewer systems in municipalities such as: universities, large publicly owned hospitals, prison complexes, highways and other thoroughfares. Storm sewer systems in very discrete areas such as individual buildings do not require coverage under this Permit.

Small MS4s do *not* include storm drain systems operated by non-governmental entities such as: individual buildings, private schools, private colleges, private universities, and industrial and commercial entities.

Stormwater means runoff during and following precipitation and snowmelt events, including surface runoff and drainage.

Stormwater Associated with Industrial and Construction Activity means the discharge from any conveyance which is used for collecting and conveying stormwater, which is directly related to manufacturing,

processing or raw materials storage areas at an industrial plant, or associated with clearing grading and/or excavation, and is required to have an NPDES permit in accordance with 40 CFR 122.26.

Stormwater Management Manual for Western Washington means the 5-volume technical manual (Publication Nos. 99-11 through 15 for the 2001 version and Publication Nos. 05-10-029-033 for the 2005 version (The 2005 version replaces the 2001 version) prepared by Ecology for use by local governments that contains BMPs to prevent, control, or treat pollution in storm water.

Stormwater Management Action Plan (SMAP) means a plan for a high priority receiving waters in need of retrofits, land management, development strategies and/or actions, or implementation of stormwater management actions.

Stormwater Management Program (SWMP) means a set of actions and activities designed to reduce the discharge of pollutants from the regulated small MS4 to the maximum extent practicable and to protect water quality, and comprising the components listed in S5 or S6 of this Permit and any additional actions necessary to meet the requirements of applicable

Vehicle Maintenance or Storage Facility means an uncovered area where any vehicles are regularly washed or maintained, or where at least 10 vehicles are stored.